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Criminal No. 18-CR-30052-MGM

Violations:

Count One: Use of a Falsely Obtained Social Security Account Number  
(42 U.S.C. § 408(a)(7)(A))

Count Two: Wire Fraud  
(18 U.S.C. § 1343)

Forfeiture Allegation:  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461)

## INDICTMENT

At all times relevant to this Indictment:

### General Allegations

1. The defendant FABRIZIO I. PLUCHINO, a/k/a “Fabrizio Pulchino” (“PLUCHINO”) was a resident of Bellingham, Massachusetts, and elsewhere.

2. From in or about December 2013, through in or about March 2016, PLUCHINO worked as a Cardiac Surgical Technologist at a hospital in Springfield, Massachusetts (the “Hospital”).

3. In exchange for his work as a Cardiac Surgical Technologist, PLUCHINO received regular salary payments from the Hospital from in or about December 2013 through in or about March 2016.

### Scheme to Defraud

4. In or about November 2013, PLUCHINO devised and intended to devise a scheme to defraud the Hospital and to obtain money by means of materially false and fraudulent pretenses,

representations, and promises.

5. PLUCHINO falsely represented facts to the Hospital and to an agent of the Hospital on his application and pre-employment records, including: (1) using a falsely obtained social security account number; (2) providing false references for his previous employment; and (3) falsely representing his employment and educational history.

6. PLUCHINO was assigned a Social Security Account Number in or about 1988. PLUCHINO subsequently falsely obtained two additional Social Security Account Numbers in 1991 and 2000, respectively.

7. From 2000, until at least 2018, PLUCHINO continued to use all three social security account numbers for various purposes.

8. During the pre-employment process at the Hospital, PLUCHINO used one of his falsely obtained social security account numbers on at least two forms, (1) United States Citizenship and Immigration Services Form I-9 and (2) Department of Treasury Internal Revenue Service Form W-4, both of which he signed and submitted on November 14, 2013.

9. During the background check phase of the pre-employment process at the Hospital, PLUCHINO provided at least two false references for his previous employment.

10. On his resume submitted to the Hospital for employment, PLUCHINO falsely represented that he worked in certain positions at certain organizations.

11. In sum, PLUCHINO made false statements and presented false information and documents to the Hospital in order to obtain employment as a Cardiac Surgical Technologist.

12. In aggregate, PLUCHINO obtained more than \$190,000 in wage payments from the Hospital.

COUNT ONE  
Use of a Falsely Obtained Social Security Account Number  
(42 U.S.C. § 408(a)(7)(A))

The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 of this Indictment as if fully set forth herein, and charges:

On or about November 14, 2013, in Hampden County, in the District of Massachusetts, the defendant,

FABRIZIO I. PLUCHINO, a/k/a “Fabrizio Pulchino,”

did willfully, knowingly, and with intent to deceive for the purpose of obtaining a thing of value, and for any other purpose, use social security account number 157-90-xxxx, assigned to the defendant by the Commissioner of Social Security on the basis of false information furnished by the defendant to the Commissioner of Social Security. Specifically, the defendant used social security account number 157-90-xxxx on United States Citizenship and Immigration Services Form I-9 and Department of Treasury Internal Revenue Service Form W-4 to obtain employment at a hospital in Springfield, Massachusetts [the “Hospital”], knowing that said social security account number had been obtained through the defendant’s submission of a false application for a second social security account number to the Commissioner of Social Security.

All in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT TWO  
Wire Fraud  
(18 U.S.C. § 1343)

The Grand Jury re-alleges and incorporates by reference paragraphs 1-12 of this Indictment as if fully set forth herein, and further charges:

On or about November 7, 2013, in the District of Massachusetts, and elsewhere, the defendant,

FABRIZIO I. PLUCHINO, a/k/a "Fabrizio Pulchino,"

having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud, as set forth below:

Count	Approximate Date	Description
2	November 7, 2013	Electronic mail sent from sales@pharmagens.com entitled "RE: Professional Reference for Fabrizio Pluchino"

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The Grand Jury further finds that:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1343, set forth in Count 2 of this Indictment, the defendant,

FABRIZIO I. PLUCHINO, a/k/a “Fabrizio Pulchino,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following asset:

a. \$193,300, to be entered in the form of a forfeiture money judgment.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant --

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or


e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

  
FOREPERSON

  
DEEPIKA BAINS SHUKLA  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: OCTOBER 25, 2018 @ 1:59 P.M.  
Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK